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Exhibit A

1 IN THE UNITED STATES COURT

2 NORTHERN DISTRICT OF OHIO

3 EASTERN DIVISION

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5 IN RE: NATIONAL PRESCRIPTION

6 OPIATE LITIGATION

MDL No. 2804

7 Case No. 17-md-2804

8 Judge Dan Polster

9 This document relates to:

10 The County of Summit, Ohio, et al.,

11 v. Purdue Pharma L.P., et al.,

12 Case No. 1:18-OP-45090 (N.D. Ohio)

13 _____/

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16 VIDEOTAPED DEPOSITION OF DARIN C. KEARNS

17 December 05, 2018, at 9:00 a.m.

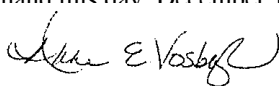
18 Akron, Ohio

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23 Reported by:

24 Anne E. Vosburgh, CSR-6804

25 Job No. 3150798

<p style="text-align: right;">Page 246</p> <p>1 Q. So the extension that you sought</p> <p>2 in 2017, that was to utilize the unspent</p> <p>3 money that did not carry over from those</p> <p>4 years, 2013 to 2017, correct?</p> <p>5 A. Yes, that is correct, so we could</p> <p>6 utilize the unspent grant funds from previous</p> <p>7 years.</p> <p>8 Q. What was that extension</p> <p>9 request -- what did that entail?</p> <p>10 A. My responsibility was essentially</p> <p>11 to calculate the unspent grant amount. That</p> <p>12 was the extent of my responsibility.</p> <p>13 Q. Did you participate in drafting</p> <p>14 any forms or submissions for that extension?</p> <p>15 A. No, I did not.</p> <p>16 Q. Do you know who was responsible</p> <p>17 for putting together the package for that</p> <p>18 extension?</p> <p>19 A. I believe Kevin Brown was</p> <p>20 responsible for putting together that packet.</p> <p>21 Q. And what was Kevin Brown's title?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know what department he</p> <p>24 was in?</p> <p>25 A. I believe he works in quality</p>	<p style="text-align: right;">Page 248</p> <p>1 Regional Partnership Grant 4?</p> <p>2 A. I don't know.</p> <p>3 Q. You don't ever recall hearing</p> <p>4 that, a regional partnership grant?</p> <p>5 A. I think the STARS grant was</p> <p>6 referred to that. That RPG4 sounds familiar,</p> <p>7 but I'm not certain.</p> <p>8 Q. The \$485,000 carryover funds,</p> <p>9 have those been incorporated into -- were</p> <p>10 those incorporated into the budget for 2018?</p> <p>11 A. Yes, they were.</p> <p>12 Q. Was SCCS already supposed to</p> <p>13 get -- were they already awarded grant money</p> <p>14 for 2018 under the five-year period of the</p> <p>15 original grant approval?</p> <p>16 A. Were we supposed to get money in</p> <p>17 '18 under the original? Is that the</p> <p>18 question?</p> <p>19 Q. Right. The grant was set to</p> <p>20 expire in 2017; is that right?</p> <p>21 A. The grant was set to expire in</p> <p>22 2017. We knew that we had made the request</p> <p>23 to expend the unused funds, so because of the</p> <p>24 budgetary process that, you know, we've</p> <p>25 discussed earlier, if we don't budget for it,</p>
<p style="text-align: right;">Page 247</p> <p>1 improvement -- worked.</p> <p>2 Q. He's deceased now, correct?</p> <p>3 A. He is.</p> <p>4 Q. And when did he pass away? Do</p> <p>5 you know?</p> <p>6 A. No. I want to say 2017, but I</p> <p>7 don't know when.</p> <p>8 Q. Now, the extension request was</p> <p>9 submitted, to your knowledge, in 2017,</p> <p>10 correct?</p> <p>11 A. Yes. So Kevin probably passed in</p> <p>12 2018, but I'm a little foggy on that.</p> <p>13 Q. I'm not going to hold you to</p> <p>14 that.</p> <p>15 Do you know whether or not SCCS</p> <p>16 received the approval for the extension</p> <p>17 request?</p> <p>18 A. Yes, we did.</p> <p>19 Q. You did.</p> <p>20 When did you receive that</p> <p>21 approval?</p> <p>22 A. I don't recall specifically when</p> <p>23 we received it, but it was late 2017.</p> <p>24 Q. The extension request, is that</p> <p>25 different than what I've seen referenced as a</p>	<p style="text-align: right;">Page 249</p> <p>1 then we can't spend it. So we went ahead and</p> <p>2 added it into the 2018 budget, really before</p> <p>3 we knew whether or not we were going to</p> <p>4 receive the extension.</p> <p>5 (Summit County Children Services</p> <p>6 2018 Budget, Bates</p> <p>7 SUMMIT_000990286 through</p> <p>8 SUMMIT_000990324, marked as</p> <p>9 Deposition Exhibit 9.)</p> <p>10 BY MS. HIBBERT:</p> <p>11 Q. I'm going to show you what I'm</p> <p>12 marking as Exhibit Number 9.</p> <p>13 A. Thank you.</p> <p>14 Q. Do you recognize that document?</p> <p>15 A. Yes, I do.</p> <p>16 Q. This is the 2018 budget, for the</p> <p>17 record, Bates Number 990286.</p> <p>18 Did you take part in the</p> <p>19 preparation of this document?</p> <p>20 A. Yes, I did.</p> <p>21 Q. Turning to page 19 of the 2018</p> <p>22 budget marked as Exhibit 9 -- let me know</p> <p>23 when you're there.</p> <p>24 A. I am.</p> <p>25 Q. The STARS grant revenue budget</p>

<p style="text-align: right;">Page 362</p> <p>1 Mr. Kearns. And I'm sorry about your 2 brother-in-law. 3 MS. HIBBERT: We can stay on the 4 record for my part, and I don't need 5 opposing counsel in the room for this. 6 I disagree with the objection and 7 the basis of the objection raised by 8 opposing counsel. It's not appropriate. 9 It's not appropriate to instruct 10 your witness not to answer when there's 11 no privilege objection or privileged 12 information on the table or being asked 13 about. And we will file a motion on 14 this issue. 15 Thank you. 16 THE VIDEOGRAPHER: Off the 17 record? 18 MR. HALLER: All set. 19 THE VIDEOGRAPHER: Off the 20 record, 6:47. 21 (Time noted: 6:47 p.m.) 22 23 24 25</p>	<p style="text-align: right;">Page 364</p> <p>1 C E R T I F I C A T E 2 3 I, ANNE E. VOSBURGH, Certified Shorthand 4 Reporter, Registered Professional Reporter, 5 Certified Realtime Reporter, and Notary 6 Public, hereby certify: 7 That DARIN KEARNS was duly sworn by me, 8 an authorized Notary Public, and that this 9 deposition is a true and correct record of 10 the testimony given by such witness to the 11 best of my knowledge and ability. 12 I further certify that I am not related 13 to any of the parties to this action and that 14 I am in no way interested in the outcome of 15 this matter. 16 In witness whereof, I have hereunto set 17 my hand this day December 10, 2018. 18  19 Anne E. Vosburgh, CSK-6804, RPR, CRR 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 363</p> <p>1 2 3 4 Whereupon, counsel was requested to give 5 instruction regarding the witness's review of 6 the transcript pursuant to the Civil Rules. 7 8 9 SIGNATURE: 10 Transcript review was requested pursuant 11 to the applicable Rules of Civil Procedure. 12 13 14 TRANSCRIPT DELIVERY: 15 Counsel was requested to give 16 instruction regarding delivery date of 17 transcript. 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 365</p> <p>1 Veritext Legal Solutions 2 1100 Superior Ave 3 Suite 1820 4 Cleveland, Ohio 44114 5 Phone: 216-523-1313 6 7 December 10, 2018 8 9 To: Michael J. Pendell 10 11 Case Name: In Re: National Prescription Opiate Litigation v. 12 Veritext Reference Number: 3150798 13 14 Witness: Darin C. Kearns Deposition Date: 12/5/2018 15 16 Dear Sir/Madam: 17 18 Enclosed please find a deposition transcript. Please have the witness 19 review the transcript and note any changes or corrections on the 20 included errata sheet, indicating the page, line number, change, and 21 the reason for the change. Have the witness' signature notarized and 22 forward the completed page(s) back to us at the Production address 23 shown 24 above, or email to production-midwest@veritext.com. 25 26 If the errata is not returned within thirty days of your receipt of 27 this letter, the reading and signing will be deemed waived. 28 29 Sincerely, 30 Production Department 31 32 NO NOTARY REQUIRED IN CA</p>